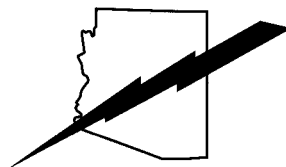


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ARIZONA MUNICIPAL POWER USERS' ASSOCIATION

POWER



USERS'



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Arizona Corporation Commission

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The Honorable Gary Pierce, Chairman, and
Commissioners
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Re: Docket E 00000C-11-0328 Comments Upon Smart Meters Issues

Dear Mr. Chairman and Member of the Commission:

On behalf of its members, the Arizona Municipal Power Users' Association wishes to comment on the issues being raised by a few members of the public and Commissioners concerning the topic of "smart" meters and the possible affect of using "smart" meters on the health, safety and welfare of electric utility customers upon whose premises such "smart" meters are placed and also the issues of "privacy" which some members of the public have commented upon.

The Arizona Municipal Power Users' Association (AMPUA) is a nonprofit information gathering and disseminating organization that was created in 1956. Among its members are the municipal electric entities of cities, towns, distribution cooperatives, generating and transmission cooperatives and special districts.

Comment:

In the process of discussing the concerns of some about the implementation of "smart" meters placed on the premises of electric customers, there has been a failure to properly distinguish, in the opinion of AMPUA and its members, the types of meters that are being put in place which are not "smart" meters, but which are meters that do aggregate usage and voltage measurements, do not invade the household of the electric consumer, and have EMF (electromagnetic frequency) and radio and other frequency characteristics which pose no health or safety threat to electric consumers and do not invade the premises of the consumer.

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Many of our members are installing what some refer to as "dumb" aggregating meters, the characteristics of which are designed to collect the usage of kilowatt-hours and measurement of voltage at a customer's location, but have no characteristics attributed commonly to the so-called "smart" meters which invade privacy in the opinion of some.

AMPUA believes the Commission, should it care to make a ruling in this matter of meters, should distinguish between the types of meters and should not permit a so-called "opt-out" procedure in the instance where the electric utility seeks only to install the aggregating "dumb" meter which has fewer of the so-called "threat characteristics" that are often referred to by some of the complaining members of the public.

In our municipal and non-jurisdictional settings, it is important to note that taxpaying utility customers are opting for efficient and effective methods of measuring the usage of electricity and allowing its more effective and efficient dispatching. It would be inappropriate and unfair and inequitable to allow a few members of the electric system to opt-out and retain a type of meter which is becoming rapidly obsolescent, will be increasingly difficult to repair or maintain in the future and will ultimately be unavailable for use because it will be no longer manufactured and put the financial burden on those members of the electric system that select a safer, healthier, more reliable and effective and efficient type of meter.

In consideration of the EMF and radio frequency issues, perhaps to retain the current older type meters which have higher degrees of EMF and radio frequency, the customers electing opt-out should be required to bring to the utility for deposit in its trash can their clock-radios, shavers, alarm clocks, hair dryers, microwave ovens, and cell phones - each of which rates worse on the measurement scale in terms of objectionable features than do the new "non-smart" aggregating meters that many of our members are installing.

Sincerely,

ARIZONA MUNICIPAL POWER USERS'
ASSOCIATION

By


its Executive Secretary

cc: Members
Utility Division Staff
Legal Division

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Commissioners of the Arizona Corporation Commission
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PROOF OF AND CERTIFICATE OF MAILING

I hereby certify that on this 7th day of October, 2011, I caused the foregoing document to be served on the Arizona Corporation Commission by delivering the original and thirteen (13) copies of the above to:

Docket Control
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

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